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6 UNITED STATES DISTRICT COURT  
7 WESTERN DISTRICT OF WASHINGTON  
8 AT SEATTLE

9 ARLENE M. BROWN,

10 Plaintiff,

11 v.

12 THE BOEING COMPANY, EMPLOYEE  
13 BENEFIT PLANS COMMITTEE,

14 Defendants.

Case No. 2:17-cv-01354-RSM

**STIPULATED MOTION REGARDING  
AMENDED COMPLAINT AND  
EXTENSION OF DEADLINES AND  
ORDER**

15  
16 **STIPULATION**

17 The parties hereby file this stipulated motion pursuant to LCR 7(d)(1) and LCR 10(g) to  
18 request that the Court set new deadlines for (1) Plaintiff to amend the complaint, (2) the  
19 Defendants to respond, and (3) the parties' FRCP 26(f) Conference, Initial Disclosures, and Joint  
20 Status Report (collectively, the parties' "Initial Scheduling Dates").

21 Plaintiff filed her complaint, *pro se*, on September 8, 2017, asserting multiple claims  
22 under the Employee Retirement Income Security Act ("ERISA"). (Dkt. #1.) On September 28,  
23 2017, the parties filed a stipulated motion to extend Defendants' deadline for responding to  
24 Plaintiff's complaint from October 2, 2017 until October 31, 2017. (Dkt. # 4.) The Court  
25 granted the stipulated motion on September 29, 2017. (Dkt. # 5.)

26 Pursuant to the Court's September 27, 2017 Order (Dkt. #3), the current Initial  
Scheduling Dates are as follows: October 25, 2017 deadline for FRCP 26(f) Conference;

1 November 1, 2017 deadline for FRCP 26(a)(1) Initial Disclosures; and November 8, 2017  
2 deadline for Joint Status Report and Discovery Plan as required by FRCP 26(f) and LCR 26(f).  
3 (*Id.* at p. 1.)

4 On October 23, 2017, the parties filed a stipulated motion to extend the Initial Scheduling  
5 Dates. (Dkt. # 10.) The Court granted the motion on October 25, 2017. (Dkt. # 11.) At the time  
6 of the filing, Defendants' counsel did not realize that Plaintiff definitively intended to amend the  
7 complaint.

8 After the stipulated motion to extend the Initial Scheduling Dates was filed, Defendants'  
9 counsel spoke by telephone with Plaintiff. During the conference, Plaintiff explained that she  
10 intends to amend the complaint to make corrections, to assert additional ERISA claims, and to  
11 attach various exhibits, including documents from the administrative record that were recently  
12 provided to Plaintiff.

13 Because Plaintiff intends to file an amended complaint, the parties have agreed that it  
14 would be inefficient and a waste of time and resources for Defendants to file a responsive  
15 pleading to the current complaint. Accordingly, the parties jointly ask the Court to extend the  
16 current deadlines in this action as follows:

- 17 • November 15, 2017: Deadline for Amended Complaint
- 18 • December 21, 2017: Deadline for Response to Amended Complaint
- 19 • January 17, 2018: Deadline for FRCP 26(f) Conference
- 20 • January 24, 2018: Initial Disclosures Pursuant to FRCP 26(a)
- 21 • January 31, 2018: Combined Joint Status Report as Required by FRCP 26(f) and  
22 LCR 26(f).

23 IT IS SO STIPULATED.

24  
25 DATED this 26 day of October, 2017.  
26

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7 *Plaintiff*

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*Attorneys for Defendants The Boeing Company  
and the Employee Benefit Plans Committee*

**ORDER**

The stipulation of the parties is hereby entered. The revised deadlines are as follows:

- November 15, 2017: Deadline for Amended Complaint
- December 21, 2017: Deadline for Response to Amended Complaint
- January 17, 2018: Deadline for FRCP 26(f) Conference
- January 24, 2018: Initial Disclosures Pursuant to FRCP 26(a)
- January 31, 2018: Combined Joint Status Report as Required by FRCP 26(f) and LCR 26(f).

IT IS SO ORDERED this 27<sup>th</sup> day of October 2017.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

By: s/ Robert M. Howie

Laurence A. Shapiro, WSBA #31301  
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By /s/ Emily A. Glunz

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